

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:) CHAPTER 13
Al Palacz,) CASE NO. 19 B 09856
Debtor(s),) Judge: Timothy A. Barnes

Al Palacz)
)
Plaintiff(s),)
)
v.) ADV. NO 19-00625
)
Real Time Resolutions Inc.)
and Mortgage Electronic Registration)
Systems Inc.)
)
Defendant(s).)

NOTICE OF MOITON

To: Al Palacz, 617 Cambridge Drive Schaumburg, IL 60193 *via U.S. Mail*

Real Time Resolutions Inc. 1349 Empire Central Dr Ste 150 Dallas, TX 75247-4029 *via U.S. Mail*

Mortgage Electronic Registration Systems William P. Beckmann, CEO 1818 Library Street, Suite 300 Reston, VA 20190 *via U.S. Mail*

Trustee Marilyn Marshall, 224 S. Michigan Ave., #800, Chicago, IL 60604 *via U.S. Mail*

Please take notice that on July 11, 2019, I will appear before Honorable Timothy A. Barnes or any Judge sitting in his place and stead in the room usually occupied by said Judge at the Dirksen Federal Court, 219 S. Dearborn, Courtroom 744, Chicago, Illinois 60604, at the hour of 10:30 a.m. and then there present the attached **MOTION FOR DEFAULT JUDGMENT**, at which time you may appear if you see fit.

/s/ David H. Cutler
David H. Cutler, esq.
Attorney for Debtor
Cutler & Associates, Ltd.
4131 Main St.
Skokie, IL 60076
Phone: (847) 673-8600

CERTIFICATE OF SERVICE

The undersigned, an Attorney, does hereby certify that a copy of this Notice and Motion was filed and sent via US MAIL to the above captioned by 10:00 p.m. on or before July 3, 2019.

By: /s/ David Cutler
David H. Cutler, esq

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Systems Inc.)	
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MOTION FOR DEFAULT JUDGMENT

NOW COMES, AL PALACZ, (hereinafter referred to as “Plaintiff”), by and through his attorneys, Cutler & Associates Ltd., and moves the Court for the entry of a default judgment against Defendant, Real Time Resolutions Inc. and Mortgage Electronic Registration Systems Inc. (hereinafter referred to as “Defendant”), and in support thereof state as follows:

1. On April 4, 2019, the Plaintiff filed a voluntary petition pursuant to Chapter 13 of Title 11, United States Code.
2. On April 23, 2019, the Plaintiff filed a complaint to determine the value of security and release of Real Time Resolutions Inc. underlying lien on the Debtor’s property located at 617 Cambridge Drive Schaumburg, IL 60193.
3. On April 23, 2019 a copy of the summons and complaint was served in accordance with Rule 7004(b)(3) of the Federal Rules of Bankruptcy Procedure by U.S. certified

mail to: Real Time Resolutions Inc., 1349 Empire Central Dr. Ste 150 Dallas, TX 75247-4029 and to Mortgage Electronic Registration Systems, William P. Beckmann, CEO 1818 Library Street, Suite 300 Reston, VA 20190.

5. The Defendant has neither filed an Appearance in this matter nor has the Defendant filed an Answer to the complaint.

6. That the Defendant is in default for failure to answer or otherwise plead to the complaint.

WHEREFORE, Plaintiff prays this Honorable Court enter a default judgment against Defendant declaring that the Defendant shall cancel and release its lien on Plaintiff's property located at 617 Cambridge Drive Schaumburg, IL 60193 and for such other relief as this Honorable Court deems fair and just.

July 3, 2019

Respectfully Submitted,

BY: /s/ David H. Cutler
David H. Cutler, esq.
Attorney for Debtor
Cutler & Associates, Ltd.
4131 Main St.
Skokie, IL 60076
Phone: (847) 673-8600